

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,
Plaintiff

v.

No. 15-CR-04268-JB

ANGEL DELEON *et al*,
Defendants.

**NEW MEXICO CORRECTIONS DEPARTMENT'S
NOTICE OF COMPLIANCE**

COMES NOW the New Mexico Corrections Department (“Department”), recognized as a part of the prosecution by order of this Court in the above-captioned matter, through undersigned counsel, and gives notice that it has substantially complied with the following subpoenas issued to the Department in lieu of discovery requests. The Department expects that the following information has been or will be disclosed in discovery and subject to the Court’s protective order on or about May 8, 2018, by the United States Attorney’s Office to defense counsel:

1. “Classification jacket for Chris Chavez” subpoenaed in *United States v. Edward Troup*;
2. “Disciplinary . . . records for inmate Joseph Otero” subpoenaed in *United States v. Billy Garcia*; and
3. “[A]ll recorded phone calls placed by inmate Joseph Otero . . . for the last six months” subpoenaed in *United States v. Billy Garcia*.

The Department further gives notice that, to the extent necessary, it believes that disclosing these records subpoenaed from a part of the prosecution team through discovery rather than delaying production for redactions required by New Mexico law (*see, e.g.*, Docs. 2214 and 2215) constitutes an adequate excuse for not producing them directly pursuant to Federal Rule of Criminal Procedure 17(g).

RESPECTFULLY SUBMITTED

/s/
Kevin L. Nault
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Certificate of Service

I certify that a true and accurate copy of the foregoing was served on all parties through the Courts CM/ECF system on the date of filing.

/s/
Kevin L. Nault